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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
14

15 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

Case No. 3:16-cv-00523-JCS

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17 CONSOLIDATED ACTION
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**DECLARATION OF DANIEL R. FONG
IN SUPPORT OF ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
CERTAIN DOCUMENT FILED IN
CONJUNCTION WITH SEAGATE'S
OPPOSITION TO PLAINTIFFS'
RENEWED MOTION FOR CLASS
CERTIFICATION**

Second Consolidated Amended Complaint
filed: July 11, 2016

DECLARATION OF DANIEL R. FONG

I, Daniel R. Fong, declare:

1. I am an associate with Sheppard Mullin Richter & Hampton, LLP, counsel of record for Seagate Technology LLC (“Seagate”). I submit this Declaration in support of Seagate’s Administrative Motion to File Under Seal pursuant to Civil Local Rule 79-5. I have personal knowledge of the facts set forth in this declaration, except where noted otherwise, and, if called as a witness, could and would competently testify to these statements.

2. Pursuant to Local Rule 79-5(d)(A) and the Court’s Order (ECF No. 182), on July 26, 2018, Seagate filed the Declaration of Allen Ng in support of Seagate Technology LLC’s Consolidated Administrative Motion to Seal Certain Documents or Portions Thereof Filed in Connection with Plaintiffs’ Motion for Class Certification (“Ng Declaration”).

3. As set forth in paragraph 18 of the Ng Declaration, ECF No. 184-1, certain portions of the Declaration of Donald Adams, PE in Support of Seagate’s Opposition to Plaintiffs’ Motion for Class Certification (“Adams Declaration”), filed in conjunction with Seagate’s initial opposition to the Plaintiffs’ initial class certification motion, contains Confidential Information that Seagate is seeking to have sealed from the public record.

4. A true and correct copy of the filed Ng Declaration is attached hereto as **Exhibit A**.

5. The Declaration of Tenaya M. Rodewald in Support of Seagate Technology LLC’s Opposition to Plaintiffs’ Renewed Motion for Class Certification (“Rodewald Declaration”) now attaches excerpts from that same Adams Declaration which contains the Confidential Information addressed by the Ng Declaration. Thus, paragraphs 105 and 106 of the Adams Declaration should be sealed for the same reasons listed in the Ng Declaration.

6. A proposed redacted version of the Adams Declaration is attached hereto as **Exhibit B**.

7. An unredacted version of the Adams Declaration, with the portions sought to be sealed noted in highlighting, is attached hereto as **Exhibit C**.

1 I declare under the penalty of perjury under the laws of the United States that the above
2 statements are true.

3 Executed this 16th day of November, 2018 in San Francisco, California.

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6 Daniel R. Fong